

# United States District Court

SOUTHERN

DISTRICT OF

ALABAMA

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

JEREMY LEE TAFF

CASE NUMBER: MJ 10-0009-C

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 5, 2009, in Baldwin County, in the Southern District of Alabama, defendant did,

**Travel in interstate commerce with the intent to kill, injure or harass another person and as a result caused substantial emotional distress to that person**

in violation of Title 18 United States Code, Section(s) 2261(A)(i).

I further state that I am a SA with the FBI and that this complaint is based on the following facts:

See Attached Affidavit hereby incorporated by reference as if fully restated herein.

Continued on the attached sheet and made a part hereof:

Yes  No

*Paul Roche*  
Signature of Complainant  
SA Paul Roche  
FBI

Sworn to before me and subscribed in my presence,

February 1, 2010  
Date

WILLIAM E. CASSADY  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

At Mobile, Alabama  
City and State

*William E. Cassady*  
Signature of Judicial Officer

PROBABLE CAUSE AFFIDAVIT

I, Paul Roche, being duly sworn, depose and state that:

I am a Special Agent with the FBI and have been since April 25, 1999. I am currently assigned to the Mobile (Alabama) Division. I am authorized to investigate violations of federal law including Title 18 U.S.C. § 2261A(1). Prior to my employment with the FBI, I was a US Army Officer in the Military Police Corps for five years.

The information contained in this Affidavit is based upon my personal knowledge, my review of certain records and documents, and information provided by other law enforcement officers and agents. The information contained herein is not all the information I possess with respect to the commission of the crime referred to herein.

I am familiar with Federal criminal laws and know that it is a violation of Title 18 U.S.C. § 2261A(1) for any person to:

travel in interstate or foreign commerce . . . , with the intent to kill, injure, harass, or place under surveillance with intent to kill, injure, harass, or intimidate another person, and in the course of, or as a result of, such travel places that person in reasonable fear of the death of, or serious bodily injury to, or causes substantial emotional distress to that person, a member of the immediate family of that person, or the spouse or intimate partner of that person.

The victim, K.W. received unsolicited emails, cards and phone messages from TAFF over the last several years. The victim and TAFF went to high school together over fifteen years ago. Within the last year these communications became sexually explicit, aggressive and threatening. Emails from January and February 2009, from Taff to K.W. included such statements as:

“I need to fuck your cute, little clittie with my rock hard boner K—“;

“I want to hold you in the old urban spoon and thrust my dick in and out of your butthole and cum in your asshole and cunt with Bethlehem forever us”; and,

“I need to do that to you K I need to lick your clit and labia inner and outer labia and taste your sweet, biblical cum in my mouth, really need to do that in the graveyard where my did is buried and my sister was married . . . ”

The victim and her husband both told TAFF to stop contacting them. Following an explicit voice mail message left on the victim’s answering machine on March 5, 2009, she contacted the Daphne Police Department and a warrant charging TAFF with Harassing Communications was issued on March 13, 2009. When TAFF first began his harassment of the victim he resided in Minnesota, but moved to Tampa, Florida. TAFF’s emails to the victim indicated he was saving

money to make a trip from Florida to see her. The victim stated that she was "terrified of what he may do should he come here."

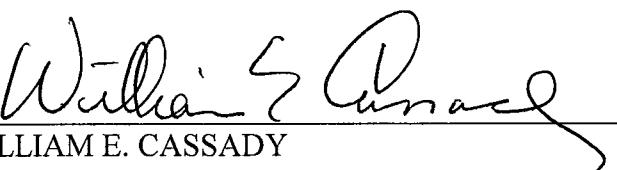
On October 5, 2009, Daphne Police responded to the victim's residence. TAFF went there saying he wanted to speak to the victim and take pictures of her. The victim's husband told TAFF he had no reason to be there and that he needed to leave.

Later on October 5, 2009, a Daphne Police Department Patrol Officer saw a car in a parking lot at Top of the Bay on Highway 98, after hours. The officer ran the Florida plate and it came back to TAFF. The officer was told by dispatch that TAFF had an outstanding warrant. Additionally, the officer was informed by dispatch that TAFF had been to the victim's house earlier that day. The officer saw a hotel key for a Microtel on the back floorboard of the car. The officer went to the nearby Microtel, and found that TAFF was registered as a guest. Two officers went to TAFF's room and when he came to the door and he was placed under arrest on the outstanding warrant.

Based upon the foregoing, probable cause exists to believe that JEREMY LEE TAFF has committed acts which violate Title 18 U.S.C. § 2261A(1), Interstate Stalking.

  
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Paul Roche  
Special Agent, Federal Bureau of Investigation

Sworn to and subscribed before me this 1<sup>st</sup> day of , 2010.

  
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WILLIAM E. CASSADY  
UNITED STATES MAGISTRATE JUDGE